

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\* \* \* \* \*

UNITED STATES OF AMERICA

v.

MICHAEL BERGDOLL

CRIMINAL NO. 04-CR-30046-MAP

\* \* \* \* \*

**DEFENDANT'S REQUEST FOR EXTENSION OF TIME WITHIN WHICH TO  
SELF SURRENDER TO BUREAU OF PRISONS**

Now comes the defendant in the above captioned matter and requests that this Honorable Court grant him a thirty day extension of the time within which to self surrender to the Bureau of Prisons. In support of this motion, the defendant states as follows:

1. The defendant was represented at sentencing by Attorney Thomas Butters, Esq. He was ordered to surrender on February 28, 2007.
2. This court granted Attorney Butters request to extend the surrender date to March 28, 2007 to give Federal Prison Consultants time to assist Mr. Bergdoll in his classification and designation issues.
3. On March 23, 2007, present counsel filed a motion requesting this court to amend the J&C to recommend participation in the RDAP program and to specifically recommend that the defendant serve his sentence at the prison camp located at the Allenwood complex in White Deer, PA.
4. Aware of the pending surrender date, counsel today called the Marshal service and learned for the first time that the defendant has been designated to Schuylkill CSP, in Schuylkill, PA. This is the first notice that either the defendant or counsel

has had that he had been designated. According to the Marshal's office, the designation occurred on January 31, 2007, but he did not know how long his office has had this information.

5. The defendant therefore requests that his surrender date be extended to April 28, 2007.

THE DEFENDANT

By /s/ David P. Hoose  
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